

## REMARKS

### I. Introduction

In response to the Office Action dated March 10, 2006, the application has not been amended. Claims 1, 3-10, 12-19, and 21-30 remain in the application. Re-examination and re-consideration of the application is requested.

### II. Prior Art Rejections

In paragraphs (2)-(3) of the Office Action, claims 1, 3-10, 12-19 and 21-30 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Moozakis, "Ford to Share Design on Web-Carmaker salvages legacy system," (Moozakis) in view of Jones et al, U.S. Patent 6,493,731.

Specifically, the independent claims were rejected as follows:

As to claim 1, Moozakis teaches a method for distributing design document changes comprising:

(a) capturing an extensible markup language (XML) representation of a revision block of a document wherein:

(i) the revision block documents a history of one or more changes made directly by one or more users to the design document (paragraph 4-6 and 12-14);

(ii) each row of the revision block represents one of the changes (column 4, lines 29-59; column 5, lines 10-56; column 6, lines 21-41);

(iii) each row of the revision block comprises a date for the change represented in the row (column 4, lines 29-59; column 5, lines 10-56; column 6, lines 21-41); and

(b) distributing the representation via a network service (paragraph 4-6)

Moozakis does not teach (ii) each row of the revision block represents one of the changes; and

(iii) each row of the revision block comprises a date for the change represented in the row

Jones teaches each row of the revision block represents one of the changes (column 4, lines 29-59; column 5, lines 10-56; column 6, lines 21-41);

(iii) each row of the revision block comprises a date for the change represented in the row (column 4, lines 29-59; column 5, lines 10-56; column 6, lines 21-41); and

Applicant traverses the above rejections.

Independent claims 1, 10, and 19 are generally directed to the use of design document revision blocks. As set forth in the prior art, revision blocks for design documents (e.g., blueprints, drawings, etc.) in the architectural, engineering, and construction fields provide information relating to changes to the design document. In the prior art, when a design document was changed, the

entire design document was transmitted with the revision block incorporated therein to describe the changes. Such a methodology was inefficient and slow.

The present invention overcomes the difficulties of the prior art. Firstly, the claims provide for details relating to the revision block. More specifically, the revision block documents a history of changes made directly by a user to a design document. Further, each row of the revision block represents one of such changes. Each row also has a date that the change represented by the row was made. Further, the revision block and various rows of the revision block are represented/captured in XML. In this regard, each row of the revision block is represented by an XML revision element with sub-elements that define the change represented in the row. Accordingly, specific details relating to the XML representation are set forth in the claims.

In addition to the above, the amended claims further provide for distributing the XML representation without transmitting the design document itself. In this regard, rather than forcing the user to open the design document or transmitting a large drawing file of the design document, the invention enables the user to merely transfer the XML representation and does not transmit the design document with the XML representation.

As described above, one of the first claim limitations is that the revision block documents a history of changes made directly by a user to the design document. In rejecting this element, the Office Action relies on Moozakis paragraphs 4-6 and 12-14. Paragraphs 4-6 merely describe a process of converting CAD drawings and design data into XML. Paragraphs 12-14 describe the ability to retain historical information about a design and a component's revision history. However, such a teaching still fails to teach the claim element. Again, the claim limitation explicitly provides that the revision block documents a history of changes made directly by a user to a design document. Moozakis merely describes a component's revision history. A component's revision history may not have been made directly by a user. For example, a supplier could release a new version of a component or offer a component in a new material. Such a supplier is not directly modifying a design document. Instead, the revision history merely illustrates the evolution of a particular component (and not a design document). Thus, such a document does not teach the invention as claimed.

The Office Action continues and admits that Moozakis fails to teach elements (a)(ii) and (a)(iii) of the claims. However, notoriously absent from the Office Action is any discussion or

reference of the limitation set forth in (a)(iv). This limitation provides that each row in the revision block is represented by an XML revision element with sub-elements that define the change represented in the row. Thus, rather than merely stating that XML is used to represent the revision block, the claims expressly provide a specific and particular format and layout for the XML. Namely, an XML revision element represents each row in the revision block. Further, sub-elements define the change represented in the row. Neither Moozakis nor Jones teach, disclose, or suggest, such an element. Further, the Office Action completely ignored this claim element. Under MPEP §2142 and 2143.03 "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." Accordingly, this claim limitation cannot merely be ignored. In this regard, the rejection has failed to establish a case of *prima facie* obviousness.

The Office Action further continues and relies on paragraphs 4-6 for the claim element of "distributing the representation via a network service". However, Applicants note that the claim limitation does not end with the word "service". Instead, the claim provides that the representation is distributed without transmitting the design document. Moozakis' paragraphs 4-6 do not even remotely describe the transmission of the XML representation of the change history without transmitting the document itself. As stated above, such a capability provides a significant advantage over the prior art. Yet, Moozakis is completely silent in this regard. Further, the Office Action merely ignores this claim limitation. Again, all words in a claim must be considered and cannot merely be disregarded. Accordingly, the rejection has failed to establish a *prima facie* case of obviousness.

To teach elements (a)(ii) and (a)(iii) of the claims, the Office Action relies on Jones. Element (a)(ii) provides that each row of the revision block represents a change made directly by a user to the design document. Element (a)(iii) provides that each row of the revision block also contains a date for the change represented in the row. The action relies on Col. 4, lines 29-59, col. 5, lines 10-56, and col. 6, lines 21-41 to teach both of these limitations.

Col. 4, lines 29-59 merely describes and defines metadata. Specifically, metadata is data referenced by a document for information about the document that is not part of the content of the

document (e.g., filename, creation date, file size, author). The text further describes FIG. 1 that illustrates a graphical flow diagram of the processing of a mortgage application.

Col. 5, lines 10-56 describes FIG. 2 that illustrates a process description of FIG. 1. More specifically, it describes the formulation of task documents as a task is completed. Resources used to complete an application document are recorded in the metadata. The resource documents, printers, and objects capture a task history by recording pre-specified resources for a particular task (see col. 5, lines 42-44).

Col. 6, lines 21-41 merely describes FIG. 4 that is an example of a task document for a particular task "x". More specifically, the text describes metadata that is stored separate from the document content using links. The document has various sections with each section having a combination of text, graphics, audio, or video, or a URL identifying a combination.

However, as can be seen from the above text and from FIG. 4 itself, there is no description, explicit or implicit, that even remotely suggests rows of a revision block or XML representations or XML elements for each such row. Instead, the text merely describes metadata and an organizational structure for metadata with various links throughout. However, unlike the present invention, Jones' metadata does not relate to nor is it even remotely similar to a change made directly to a design document. Instead, the metadata is merely data in or referenced by a document that refers to information about a document that is not part of the content of the document. The examples provided in Jones do not even remotely refer to a change to a design document or a date of such a change. Further, the claim limitations explicitly provide and identify information that is contained in each row of the revision block (which is then represented by a specific format of XML). Such rows and the information contained in the rows are not even remotely alluded to in Jones. In this regard, Jones merely describes a document property and a resource property and creation dates for such properties (see item 407 and 411 respectively).

However, the creation date is in a separate row from the property and further fails to provide a date for a change. Instead, the creation date is merely the creation date for the property. Again, the claims provide that each row represents a change directly to a design document and each row has a date for the change represented by the row. No such format or even remote reference to such a format is taught, disclosed, or suggested by or in Jones.

Applicants also submit that there is no motivation to combine Moozakis with Jones. In this regard, Moozakis merely describes web translation software (see paragraph 1) while Jones describes a process for recording and viewing metadata of a document (see Abstract). Such teachings are not similar nor do they even suggest the possibility or motivation for combining.

In addition, even if Moozakis were combined with Jones, the present invention would not result. In this regard, the Office Action admits that Moozakis fails to teach the claim limitations directed towards the content of the various rows. However, Jones also fails to describe any such rows or formatting. Accordingly, the combination would not result in the present invention.

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Moozakis and Jones. In addition, Applicant's invention solves problems not recognized by Moozakis and Jones.

Thus, Applicant submits that independent claims 1, 10 and 19 are allowable over Moozakis and Jones. Further, dependent claims 3-9, 12-18 and 21-30 are submitted to be allowable over Moozakis and Jones in the same manner, because they are dependent on independent claims 1, 10 and 19 respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 3-9, 12-18 and 21-30 recite additional novel elements not shown by Moozakis and Jones.

III. Conclusion


In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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